

SUFFOLK FEDERAL CREDIT UNION,

Plaintiff,

- against -

CUMIS INSURANCE SOCIETY, INC.,

Defendant.

10-CV-0001-ADS-ETB

**REPLY DECLARATION OF JEREMY S. GOLDMAN**

I, JEREMY S. GOLDMAN, declare as follows:

1. I am counsel at the law firm Frankfurt Kurnit Klein & Selz, P.C., attorneys for plaintiff Suffolk Federal Credit Union (“Suffolk”) in the above-captioned action. I am admitted to practice in this Court.
2. I submit this Reply Declaration for the Court’s convenience to annex the following documents which are referenced in the accompanying Reply Memorandum of Law in Further Support of Plaintiff Suffolk Federal Credit Union’s Motion for Reconsideration.
3. Attached hereto as Exhibit A is CUMIS Insurance Society, Inc.’s Statement of Uncontroverted Facts and Supporting Evidence Pursuant to Local Rule 56.1, dated February 22, 2012.
4. Attached hereto as Exhibit B is CUMIS Insurance Society, Inc.’s Statement of Material Facts in Opposition to Plaintiff’s Statement of Material Facts Pursuant to Local Rule 56.1, dated June 22, 2012.
5. Attached hereto as Exhibit C are excerpts from the transcript of the deposition of Lisa Mingoia, dated July 27, 2011.

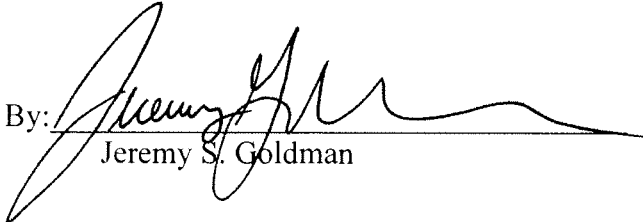
6. Attached hereto as Exhibit D are excerpts from the transcript of the deposition of Bruce Simpson, dated July 14, 2011.

7. Attached hereto as Exhibit E is the Complaint filed in this action on January 4, 2010.

8. Attached hereto as Exhibit F is an excerpt from Credit Union Bond Number 001740-18.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
January 28, 2013

By:   
Jeremy S. Goldman